```
Page 13
                                                                                                                    Page 14
               Any time -- definitely informal. Any time
                                                                   bosses have that we will go police that jurisdictional
    that there is quote unquote a call goes out for
                                                                   boundary. But I don't -- I'm not sure. It's never
                                                               2
3
    assistance or help, we do help each other.
                                                               3
                                                                   come up.
               Okay. And with Hampton in particular, the
                                                               4
                                                                        Q
                                                                             Okay. You've always assisted?
                                                               5
5
    city of Hampton, does your department have any
                                                                        Α
                                                                             Yes. We've never not helped somebody who
    agreements with that city or their law enforcement?
                                                                   asked for help.
6
                                                               6
7
               Only that we will come and assist when they
                                                               7
                                                                             Does your department have policies that
8
    ask.
                                                               8
                                                                   regulates the conduct of your officers?
9
                                                               9
              Okay. And is that up to your discretion or
                                                                        Α
                                                                             Yes.
         0
10
    is it required?
                                                              10
                                                                        Q
                                                                             And are they called policies?
               MR. WILLIAMS: Object to the form. Do you
11
                                                              11
                                                                        Α
12
         mean required by law or required by --
                                                              12
                                                                             Is there another name for them?
13
               By any policy or law or regulation,
                                                              13
                                                                             Well there's lots of different jargon. I
14
    anything.
                                                              14
                                                                   mean SOP, standard operating procedures, policies.
15
              MR. WILLIAMS: -- police department policy?
                                                                   That would coincide with the same thing.
                                                              15
16
              Well let me ask is it in your discretion
                                                                             Okay. But these policies can all be found
                                                              16
17
    whether you assist a municipality?
                                                              17
                                                                   in one place, in one document?
18
              I guess I've never -- I can't imagine a
                                                              18
                                                                        Α
                                                                             Yes.
    situation where -- I guess it hasn't come up because
                                                              19
                                                                        Q
                                                                             These policies, they are modified from time
20
    we never not tried to help each other.
                                                              20
                                                                   to time; right?
21
               I want to say the only formal agreement in
                                                              21
                                                                             Absolutely.
                                                                        Α
22
   place is like for the city of Stockbridge which is
                                                              22
                                                                        Q
                                                                             Okay. And what causes those policies to be
    also a municipality within our boundaries. Because
                                                              23
                                                                   modified?
24
    they currently don't have a police department, there
                                                              24
                                                                             We're also a state accredited agency. So
   is something that -- in writing that -- between the
                                                                   they are constantly updated to make sure they are the
                                                                                                                   Page 16
                                                     Page 15
1 best practices. Also if we happen to see a deficiency
                                                               1
                                                                        Α
                                                                             Yes.
2
    or something is not covered, that could cause them to
                                                               2
                                                                        Q
                                                                             Do you know Robert Butera and Quinton
3
    be changed.
                                                               3
                                                                   Phillips?
         Q
                                                               4
4
               Okay. And who has the authority to modify
                                                                             Yes. They were officers that worked for me.
5
    the policies?
                                                               5
                                                                             (Plaintiff's Exhibits 1 and 2 were marked
              I'm the ultimate signer on every policy.
                                                                        for identification.)
                                                               6
                                                               7
                                                                             I'm going to show you Plaintiff's Exhibits 1
    But it would be staff normally that would bring some
                                                               8
8
    type of change to me that needed to be changed for
                                                                   and 2. These are photographs.
9
    either a best practice or a legal change.
                                                               9
                                                                             Do you recognize the people in these
               Does the county manager or the commission
10
                                                              10
                                                                   photographs?
11
    have any say in that?
                                                              11
                                                                        Α
                                                                             Butera and Phillips.
12
               They don't.
                                                              12
                                                                             Is Butera in Exhibit 1?
13
               Okay. Do you know who Fernando Rodriguez
                                                              13
                                                                        Α
14
    is?
                                                              14
                                                                             And Phillips is in Exhibit 2?
                                                                        0
15
                                                              15
         Α
              Yes.
16
                                                              16
                                                                             Are these fair and accurate representations
         Q
              Who is he?
               I believe that's the young man the incident
17
         Α
                                                              17
                                                                   of what they look like?
    happened in Hampton why we're here.
                                                              18
                                                                        Α
                                                                             Yes, sir.
19
         Q
              What is the incident?
                                                              19
                                                                             Okay. How long have you known these two
20
               Hampton Police Department came upon him
                                                              20
                                                                   men?
    naked walking down the road and attempted to arrest
                                                                             I guess as long as they have worked for me.
                                                              21
22
    him and called for my officers to backup to effect
                                                              22
                                                                   I didn't know them prior to that.
23
    that arrest.
                                                              23
                                                                             And how long have they worked for you
                                                                        0
24
         Q
               Okay. And did your officers come to the
                                                              24
                                                                   roughly?
25
                                                              25
    scene?
                                                                        Α
                                                                             I'd have to look in the records. I mean
```

